

FILED

AUG 25 2022

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF OHIO

EASTERN DIVISION

UNITED STATES OF AMERICA,

) INDICTMENT

Plaintiff,

)

v.

) CASE NO.

JESUS MIGUEL PEREZ GUICHO,
CARLOS ALBERTO VALENZUELA-
SANCHEZ,
TAREEF LAMARR KEITH CHANEY,

1:22 CR 503

Defendants.

JUDGE LIOLI

COUNT 1

(Conspiracy to Distribute and Possess with Intent to Distribute
Controlled Substances, 21 U.S.C. § 846)

The Grand Jury charges:

1. On or about August 10, 2022, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants JESUS MIGUEL PEREZ GUICHO, CARLOS ALBERTO VALENZUELA-SANCHEZ, and TAREEF LAMARR KEITH CHANEY, did unlawfully, knowingly, and intentionally combine, conspire, confederate, and with others known and unknown to the Grand Jury, to distribute and possess with intent to distribute 400 grams or more of a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

All in violation of Title 21, United States Code, Section 846.

COUNT 2

(Possession with Intent to Distribute a Controlled Substance,
21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

The Grand Jury further charges:

2. On or about August 10, 2022, in the Northern District of Ohio, Eastern Division, Defendants JESUS MIGUEL PEREZ GUICHO, CARLOS ALBERTO VALENZUELA-SANCHEZ and TAREEF LAMARR KEITH CHANEY did knowingly and intentionally possess with the intent to distribute 400 grams or more of a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

COUNT 3

(Interstate Travel in Aid of Racketeering, 18 U.S.C. § 1952(a)(3))

The Grand Jury further charges:

3. From on or about July 10, 2022, to on or about August 10, 2022, in the Northern District of Ohio, Eastern Division and elsewhere, Defendants JESUS MIGUEL PEREZ GUICHO and CARLOS ALBERTO VALENZUELA-SANCHEZ traveled in foreign commerce from the State of Arizona to the State of Ohio with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, to wit: a business enterprise involving the distribution of a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A) and 846, and thereafter performed and attempted to perform acts to promote, manage, carry on, and facilitate the promotion, management, and carrying on of said unlawful activity, in violation of Title 18, United States Code, Section 1952(a)(3).

FORFEITURE

The Grand Jury further charges:

4. For the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853; Title 18, United States Code, Section 981(a)(1)(C); and Title 28 United States Code, Section 2461(c), the allegations of Counts 1, 2 and 3 are incorporated herein by reference. As a result of the foregoing offenses, Defendants JESUS MIGUEL PEREZ-GUICHO, CARLOS ALBERTO VALENZUELA-SANCHEZ, and TAREEF LAMARR KEITH CHANEY, shall forfeit to the United States any and all property constituting, or derived from, any proceeds they obtained, directly or indirectly, as the result of such violations; and any and all of their property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations; and any property real or personal, which constitutes or is derived from proceeds traceable to such violations.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.